

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

In the Matter of the Petition by the  
SARATOGA HOMEOWNERS COMMITTEE, ET AL.  
for Review of Order No. 81-12,  
California Regional Water Quality  
Control Board, Los Angeles Region. Our  
File No. A-294.

Order No. WQ 81-13

BY THE BOARD:

On April 27, 1981, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) adopted Order No. 81-12, revised waste discharge requirements for County Sanitation Districts of Los Angeles County, Calabasas Sanitary Landfill (District). Order No. 81-12 applies to a 300-acre site located about one-half mile north of Freeway 101 and one mile east of Agoura.

Saratoga Homeowners Committee, et al. filed a petition with the State Water Resources Control Board (State Board) on May 21, 1981, as provided by Water Code Section 13320. The petitioners are homeowners, in both individual and representative capacities, who live below and nearby the landfill site. They object to the order because they contend they cannot live safely and healthily in their homes unless there is an immediate clean-up of the hazardous waste in the landfill and immediate closure of the site to Group 2 and Group 3 wastes. Petitioners contend that since the site, which opened in 1965, does not meet the 1972 state

permeability guidelines for a Class I site, it must be emptied of wastes immediately. Immediate closure of the site to Group 2 and Group 3 wastes should also be required, according to the petitioners, because methane gas is presently migrating beneath the landfill.

Petitioners make other assertions concerning the order. They contend that the order requires the installation of man-made barriers intended to prevent laterally moving leachate from leaving the site without ascertainment of the drainage points from the site. As will be seen below, the order requires that the District submit a plan, including design features and construction time schedule, for installation of a leachate control system. The plan will be predicated on ascertainment of drainage points. Petitioners also assert that Regional Board Order No. 81-12 fails to consider the methane gas problem or to institute remedial action. Again, as noted below, the Order does require a plan with a time schedule for implementation of a system to collect and control landfill gas.

Findings of Regional Board Order No. 81-12 include acknowledgment of the fact that both long-term and short-term field tests indicate bedrock permeabilities which do not meet state guidelines. However, analysis of samples taken from monitoring wells on the perimeter of the site indicate that no liquid wastes have migrated to those shallow groundwater monitoring wells. A further finding is that disposal of all liquid industrial wastes and hazardous wastes was suspended as of July 31, 1980

pending additional studies to determine if the landfill can meet current state guidelines. These studies were conducted by Leroy Crandell and Associates, a consulting firm employed by the District in 1979 to study the hydrogeology of the entire Calabasas landfill site.

Regional Board Order No. 81-12, which petitioners want reviewed by the State Board, includes the following provisions and general requirements:

1. The Class I designation of Calabasas landfill was changed from Class I to Class II and disposal of Group 1 wastes is prohibited.<sup>1/</sup>

2. Disposal of all liquid wastes in the permit area is prohibited.

3. A requirement that the District maintain records of the total volume and types of Group 2 and 3 wastes accepted for disposal, submitting those records to the Regional Board monthly.

4. Not later than six months after the adoption date of this Order, the District shall submit the following technical reports for Executive Officer's review and approval:

- a. A plan including design features and construction time schedule for installation of a leachate control system.

- b. A plan with a time schedule to collect and control landfill gas.

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1. We note with approval that the District checks randomly selected loads for hazardous liquid wastes. Those samples indicate that only one-half of 1 percent by weight of such wastes now enter the site.

c. A site drainage plan for diversion and control of rainfall runoff.

d. A comprehensive groundwater monitoring program with an implementation time schedule. The program shall include specific locations, depths, details, drawings and design specifications for needed monitoring and/or observation wells to be utilized in the groundwater sampling and testing program.

5. The site shall be protected from any washout that could occur as a result of a 100-year storm.

6. Gases and leachate shall be prevented from unreasonably affecting groundwater.

7. The discharger shall ensure that wastes will be placed above the highest anticipated elevation of the capillary fringe of underlying groundwater.<sup>2/</sup>

8. The discharger shall comply with all monitoring and testing requirements established by this Board's Executive Officer.

At the conclusion of the six-month period accorded to the District to submit technical reports and protective plans, the Regional Board will review the technical reports and make appropriate revisions to the waste discharge requirements. This revised permit will include a time schedule for implementation of the plans. Thus, Order No. 81-12 is, in effect, an interim

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2. The thickness of the capillary fringe is dependent on the grain size of the soil and commonly ranges from up to 10 feet thick in clays to negligible in gravels. At the Calabasas site, groundwater levels have been determined to be over 200 feet deep. Thus, even with a maximum capillary fringe, waste deposition will still be far above the top of the capillary fringe.

order, designed to allow the District and the Regional Board staff time to further evaluate geologic conditions and to determine whether state of the art techniques can be utilized to protect against substandard permeability conditions.

## I. DISCUSSION

The State Board may refuse to review a Regional Board order if the petition fails to raise substantial issues that are appropriate for review. While the homeowner petitioners have raised substantial issues concerning their safety as it may be affected by the groundwater and methane gas build-up, we believe the Regional Board order has taken appropriate interim remedial action in view of the evidence available at this time. Though both short-term and long-term bedrock permeability do not meet current standards, there is no evidence that liquid wastes have migrated through alluvium to existing shallow groundwater monitoring wells. In addition, the challenged order provides for complete updating of the site drainage plan. Implementation of that plan will divert all surface water from surrounding areas. Construction of the proposed clay barriers at drainage points will provide added protection. These barriers will be installed to cut off possible migration of leachate through alluvial materials that are in the canyon bottoms leading away from the site. Approximately 20 shallow wells will be constructed in conjunction with these barriers. This system of barriers and shallow wells is designed to prevent the lateral movement of leachate from the site.

Finally, a comprehensive groundwater monitoring program is required by the order. In this regard, the District is requesting proposals from hydrogeology consultants concerning the locations and specifications of wells which will be installed into bedrock at the site. These proposed wells will monitor for groundwater quality variation caused by deep percolation of waste-affected fluids.

Excessive permeabilities in soils overlying groundwater cause us concern. We are particularly concerned with the lack of data regarding vertical permeability. However, given the limited evidence now available, we think the Regional Board order is reasonable. It allows time to further assess the geologic characteristics of the site and to evaluate state of the art methods of leachate containment, while at the same time implementing measures to contain leachate migration which might be occurring. However, because of our concern, we will require the Regional Board Executive Officer to furnish us monthly reports on the status of on-going studies and containment plans.

The Regional Board order contains no findings of fact concerning methane gas build-up. Though petitioners ask for closure of the landfill because of methane gas build-up, they admit in their petition that the extent of the problem is not known, referring to a "substantial methane gas problem". The State Solid Waste Management Board evaluated the site on June 2, 1981, and found it in compliance with the Federal Resource Conservation and Recovery Act standards for explosive gases and

fires. No gas was detected at probes in the border of the landfill that is adjacent to homes. In view of this and the fact that Order No. 81-12 provides for a plan of collection and control of gas, intervention by the State Board is not appropriate at this time.

## II. CONCLUSION

We have decided to dismiss the petition without prejudice to the cause of the petitioners. As stated above, the Regional Board is scheduled to issue additional revised waste discharge requirements after October 30, 1981, when the technical reports required by the Order must be submitted. We expect the revised waste discharge requirements to be adopted at or before the February 1982 Regional Board meeting. If this permit is not noticed in the agenda for the February Regional Board meeting, the Regional Board should contact the State Board with good cause for delay. Following the adoption of these revised waste discharge requirements, petitioners may either file another petition or they may renew the present petition with amendments and augmentation needed to update it and bring it into compliance with Title 23, California Administrative Code, Section 2050. On the other hand, further action by the Regional Board may satisfy petitioners' concerns and render unnecessary further review by us. If new requirements are not adopted by February 1982, the petitioners may renew the present petition subject to compliance with Section 2050.

### III. ORDER

IT IS, THEREFORE, ORDERED that this matter be dismissed without prejudice.

IT IS FURTHER ORDERED that:

1. The Regional Board's Executive Officer furnish the State Board monthly status reports on the progress of the studies and containment plans.

2. The Regional Board revise the waste discharge requirements by February 1982 unless good cause exists for delay.

DATED: August 20, 1981

/s/ Carla M. Bard  
Carla M. Bard, Chairwoman

/s/ L. L. Mitchell  
L. L. Mitchell, Vice-Chairman

/s/ Jill B. Dunlap  
Jill B. Dunlap, Member

/s/ F. K. Aljibury  
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DATED: August 20, 1981

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Carla M. Bard, Chairwoman

/s/ L. L. Mitchell  
L. L. Mitchell, Vice-Chairman

/s/ Jill B. Dunlap  
Jill B. Dunlap, Member

/s/ F. K. Aljibury  
F. K. Aljibury, Member